



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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April 11, 1997

Mr. Thomas Teynor
U.S. Department of Energy
P.O. Box 550, MSIN: S7-55
Richland, WA 99352

Mr. William Adair
Fluor Daniel Hanford, Inc.
2440 Stevens Ctr., MSIN: H6-21
Richland, WA 99352

Mr. Duane Renberger
Rust Federal Service of Hanford, Inc.
P.O. Box 700, MSIN: T3-03
Richland, WA 99352



Dear Messrs. Teynor, Adair, and Renberger:

Re: Close-Out of May 21, 1996, Dangerous Waste Compliance Inspection of Mis-Designated Waste Received at Hanford

On May 21, 1996, the Washington State Department of Ecology (Ecology) conducted an inspection of waste received at the Hanford Site from Lawrence Berkeley National Laboratories (LBNL) located in Berkeley, California. The waste had been mis-designated as low level waste instead of mixed waste. In a Notice of Correction issued June 28, 1996, Ecology cited the U.S. Department of Energy (USDOE) and Westinghouse Hanford Company for two violations of Washington Administrative Code (WAC), Chapter 173-303, Dangerous Waste Regulations. The violations were, failure to confirm knowledge of waste received per WAC 173-303-300, General Waste Analysis, and failure to notify Ecology of the unmanifested waste per WAC 173-303-390, Facility Reporting. Ecology received the notification regarding the mis-designated waste, as required per WAC 173-303-390, and closed this portion of the inspection by letter, dated November 15, 1996.

Ecology considers the outstanding corrective measure to resolve the violation regarding General Waste Analysis completed as a result of the enclosed agreement reached between Ecology and USDOE. This agreement establishes minimum verification rates for receipt of solid mixed

Messrs. Teynor, Adair, and Renberger

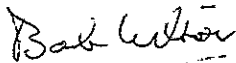
April 11, 1997

Page 2

waste at Hanford treatment, storage, or disposal units. This letter serves to close the May 21, 1996, inspection regarding receipt of mis-designated waste from LBNL.

If you have any questions or concerns regarding the above information, please contact me at (509) 736-3031.

Sincerely,



Bob Wilson, Compliance Inspector
Nuclear Waste Program

BW:sb
Enclosure

cc: James Rasmussen, USDOE
Susan Price, FDH
John Winterhalder, RFS
Mary Lou Blazek, ODOE
Administrative Record

VERIFICATION REQUIREMENTS FOR SOLID WASTE WAP GUIDANCE

Agreements reached April 2, 1997

For Off-Site Shipments

A generator is defined as having a unique EPA ID #.

Waste received for treatment, storage or disposal will be verified according to requirements of WAC 173-303-300. The minimum physical verification rate is 10% of each waste stream applied per generator, per shipment.

For On-Site Shipments

For verification purposes only, waste streams generated by each of the Hanford Prime contractors and each of their sub-contractors will be verified at 5% per year.

For verification purposes only, a waste stream is defined as having similar physical and chemical characteristics and waste codes, and the same LDR treatment requirements and waste management requirements. This is described in WHC-EP-0846-0, Section 3.3. The guidance document and WAPs will describe this waste stream criteria and not directly reference the WSRds. (Referencing the WSRds would tie them into the permit and require a permit modification as changes are made).

Minimum physical verification requirements = 5% of each waste stream, applied per sub-contractor per year. The 5% verification sample must be representative of the entire waste stream. Therefore, the following requirements must be met by the receiving TSD Unit:

1. Every complex (i.e., PUREX, B-Plant) or clean-up project (300 FF-1) must be verified every calendar year;
2. Verification must begin with the first shipment received for that population (i.e., same waste stream and same sub-contractor); and
3. Verification samples must be distributed throughout the calendar year.

Physical Screening Exceptions

1. Shielded, classified, and remote handled mixed waste are not required to be physically screened; however, the TSD unit must perform a more rigorous documentation review and obtain the raw data used to characterize the waste. (<1% of current waste receipts) Ecology will be notified and have the opportunity to review information on these wastes prior to shipment. For classified wastes it is necessary to have an appropriate DOE security clearance and a need to know the information as defined by the classifying organization or agency.
2. Wastes which cannot be verified at the TSD unit or associated verification facility by the methods denoted must be verified at the generating unit (e.g., large components,

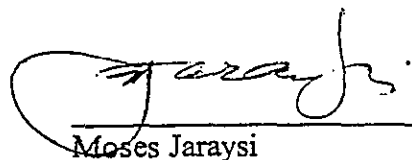
containers which cannot be opened, are greater than 20 mrem/hr, contain greater than 10 nCi/gram of transuranic radionuclides, or will not fit into the NDE unit.) Physical screening at the customer location consists of observing the packaging of the waste. If no location can be found to perform the physical screening, no screening is required.

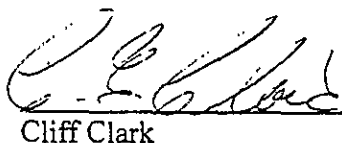
NOTE: Transuranic radionuclides are defined as alpha-emitting radionuclides with an atomic number >92 and with half-lives greater than 20 years. In addition, radium sources and Uranium 233 are considered transuranic radionuclides.

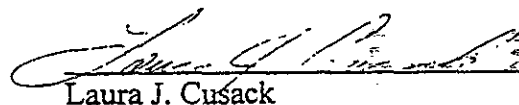
3. Wastes which are packaged by the TSD unit authorized independent agent are considered to have met the physical screening requirements denoted in this guidance (e.g., RFSH packaged waste which is transferred to RFSH operated TSD units or PNNL packaged waste which is transferred to PNNL operated TSD units.)
4. A bulk waste stream may be verified by screening allowable rate of the total number of loads throughout the waste stream.

NOTE: A bulk waste stream is defined as large volumes of waste from a single generating event (e.g., soil remediation from a single location.)

 4/2/97
Tom Teynor

 4/2/97
Moses Jaraysi

 4/2/97
Cliff Clark

 4/2/97
Laura J. Cusack